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WELLS FARGO BANK, N.A.



18 UNITED STATES DISTRICT COURT

19 NORTHERN DISTRICT OF CALIFORNIA. SAN JOSE DIVISION

20 STEPHANIE MARTINEZ, an  
21 individual,

22 Plaintiff,

23 v.

24 WELLS FARGO BANK, N.A., and  
25 DOES 1 through 20, inclusive,

26 Defendants.

Case No. 5:15-cv-02414-BLF

JOINT DISCOVERY PLAN

[Complaint filed: April 10, 2015]

1 Pursuant to the Court's order, Plaintiff Stephanie Martinez ("Plaintiff") and  
2 Defendant Wells Fargo Bank, N.A. ("Wells Fargo" or "Defendant") hereby submit  
3 the following discovery plan.

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5 Per the Court's order, the Federal Rules of Civil Procedure will apply to discovery.

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7 The parties propose the following discovery and pre-trial deadlines:

- 8 • Close of Non-Expert Witness Discovery: October 3, 2016
- 9 • Hearing on Dispositive Motions: November 17, 2016 (set by the Court)
- 10 • Exchange of Expert Witness Reports: December 1, 2017
- 11 • Close of Expert Discovery: January 5, 2017
- 12 • Final Date to Submit Rule 26(a)(3) Witness Lists, Designations of  
13 Witnesses Whose Testimony Will Be Presented by Deposition, and  
14 Exhibit Lists: January 12, 2017
- 15 • Pre-Trial Conference: January 19, 2017 (set by the Court)
- 16 • Final Date to File Objections Under Rule 26(a)(3): January 19, 2017

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18 DATED: February 22, 2016

**LAWRENCE W. FREIMAN**

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20 By: \_\_\_\_\_ /s/  
21 Lawrence W. Freiman, Esq.  
Michael J. Freiman, Esq.

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23 Attorneys for Plaintiff Stephanie  
24 Martinez

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1 DATED: February 22, 2016

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SHEPPARD, MULLIN, RICHTER &  
HAMPTON LLP

By \_\_\_\_\_ /s/  
THOMAS R. KAUFMAN  
MARLENE M. NICOLAS  
Attorneys for Defendant  
WELLS FARGO BANK, N.A.

## PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

At the time of service, I was over 18 years of age and **not a party to this action**. I am employed in the County of Los Angeles, State of California. My business address is 333 South Hope Street, 43rd Floor, Los Angeles, CA 90071-1422.

On February 22, 2016, I served true copies of the following document(s) described as **JOINT DISCOVERY PLAN** on the interested parties in this action as follows:

Lawrence W. Freiman, Esq.  
Michael J. Freiman, Esq.  
100 Wilshire Blvd., Suite 940  
Santa Monica, CA 90401

**BY MAIL:** I enclosed the document(s) in a sealed envelope or package addressed to the persons at the addresses listed in the Service List and placed the envelope for collection and mailing, following our ordinary business practices. I am readily familiar with the firm's practice for collecting and processing correspondence for mailing. On the same day that the correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope with postage fully prepaid. I am a resident or employed in the county where the mailing occurred.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on February 22, 2016, at Los Angeles, California.

/S/